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6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
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12 Plaintiff,
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14 v.
15 JERRY ALEXANDER CISNEROS,
Defendant.

CASE NO. 1:22:CR-00329 ADA-BAM

STIPULATION AND PROTECTIVE ORDER

16 WHEREAS, the discovery in this case contains personal identifying information regarding
17 confidential victims and witnesses, including, but not limited to dates of birth, driver's license numbers,
18 residential addresses, phone numbers, photographs, audio recordings, and video recording ("Protected
19 Information"); and

20 WHEREAS, the parties desire to avoid the disclosure or dissemination of this information to
21 anyone not a party to the court proceedings in this matter;

22 The parties agree that entry of a stipulated protective order is appropriate.

23 THEREFORE, Defendant, by and through his counsel of record, ("Defense Counsel"), and the
24 United States of America, by and through Assistant United States Attorney Justin J. Gilio, hereby agree
25 and stipulate as follows:

26 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
27 Criminal Procedure, and its general supervisory authority.
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2. This Order pertains to the Protected Information, the Bates numbers pertaining to which will be specific when produced or made available to Defense Counsel (“the discovery”). This Order also relates to any verbal communications between the government and Defense Counsel about the confidential information.

3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any documents, recordings, or other information, verbal or written, that contain Protected Information with anyone other than Defense Counsel attorneys, designated defense investigators, and support staff. Defense Counsel may permit the Defendant to view unredacted documents in the presence of his attorney, defense investigators, and support staff. The parties agree that Defense Counsel, defense investigators, and support staff shall not allow the Defendant to copy Protected Information contained in the discovery. The parties agree that Defense Counsel, defense investigators, and support staff may provide the Defendant with copies of documents from which Protected Information has been redacted.

4. The discovery and information therein may be used only in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the United States of America (“Government”). Defense counsel will return the discovery to the Government at the conclusion of the case after the exhaustion of all direct and collateral appeals or certify that the discovery has been destroyed.

5. Defense Counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement.

6. Defense Counsel shall be responsible for advising the Defendant, employees, and other members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

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1 IT IS SO STIPULATED.

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3 Dated: April 18, 2023

PHILLIP A. TALBERT
United States Attorney

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5 By: /s/Justin J. Gilio
JUSTIN J. GILIO
6 Assistant United States Attorney

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8 Dated: April 18, 2023

By: /s/Mark Coleman
Mark Coleman
Attorney for Defendant
JERRY ALEXANDER CISNEROS

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11 IT IS SO ORDERED.

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13 Dated: April 18, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE